

**DEPOSITION TRANSCRIPT EXCERPTS TO BE READ INTO THE RECORD OR
PLAYED AT TRIAL AS SUBSTANTIVE EVIDENCE BY THE DEFENDANT
PURSUANT TO CIVIL LOCAL RULE 16(c)(F)**

Attachment 1 to Defendant's Rule 16 Pretrial Report

Excerpts from Deposition of Derrick N. Weber, Esq., dated December 20, 2019

- 14:8-16:8
- 16:22-17:11
- 18:9-25

Excerpts from Deposition of James E. Kachelski, Esq., dated April 29, 2020

- 5:12-19
- 6:24-7:4

Excerpts from Deposition of Plaintiff Scott Frakes, dated March 9, 2020

- 17:1-18:25
- 19:19-21
- 20:13-21:15
- 26:10-25
- 28:3-p. 29:6
- 32:23-33:9; 34:1-2
 - 43:8-13
- 48:23-49:10
 - 50:7-20
- 65:20-66:3
- 67:9-11; 68:13-18
 - 69:10-70:7
 - 93:19-94:8
 - 101:5-14
- 107:23-108:15
 - 111:21-22
 - 116:15-18
 - 117:8-25
 - 118:1-11

Dated this 11th day of December, 2020.

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s/ Jillian N. Walker

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